



# *COMMONWEALTH of VIRGINIA*

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### Blue Ridge Regional Office

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

**Lynchburg Office**  
7705 Timberlake Road  
Lynchburg, Virginia 24502  
(434) 582-5120  
Fax (434) 582-5125

David K. Paylor  
Director

Robert J. Weld  
Regional Director

**Roanoke Office**  
3019 Peters Creek Road  
Roanoke, Virginia 24019  
(540) 562-6700  
Fax (540) 562-6725

### Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Elkay Manufacturing Company
Facility Name:	Elkay Wood Product Company
Facility Location:	2000 Cane Creek Parkway Ringgold, Virginia
Registration Number:	32035
Permit Number:	BRRO-32035

This permit includes the following programs:  
Federally Enforceable Requirements - Clean Air Act

September 6, 2013  
Effective Date

September 5, 2018  
Expiration Date

Robert J. Weld, Regional Director

Signature Date

Table of Contents, 1 page  
Permit Conditions, 6 through 39 pages

## Table of Contents

<b>FACILITY INFORMATION .....</b>	<b>3</b>
<b>EMISSION UNITS .....</b>	<b>5</b>
<b>DIESEL ENGINE (EG1) REQUIREMENTS.....</b>	<b>6</b>
LIMITATIONS.....	6
MONITORING AND RECORDKEEPING.....	7
<b>WOODWORKING EQUIPMENT REQUIREMENTS (WW1 – WW6).....</b>	<b>8</b>
EMISSION CONTROL .....	8
LIMITATIONS.....	9
MONITORING.....	10
RECORDKEEPING.....	10
COMPLIANCE ASSURANCE MONITORING (CAM) .....	10
TESTING .....	13
<b>FURNITURE FINISHING EQUIPMENT CONDITIONS (H1, M1, M2, S1, RC-1) .....</b>	<b>14</b>
EMISSION CONTROL .....	14
LIMITATIONS.....	14
MONITORING.....	15
RECORDKEEPING.....	15
<b>WOOD FURNITURE MACT (40 CFR 63 SUBPART JJ).....</b>	<b>16</b>
WOOD FURNITURE MACT REQUIREMENTS – LIMITATIONS .....	16
WOOD FURNITURE MACT REQUIREMENTS – WORK PRACTICE STANDARDS .....	18
WOOD FURNITURE MACT REQUIREMENTS – LIMITATIONS – .....	21
WOOD FURNITURE MACT REQUIREMENTS – MONITORING – .....	22
WOOD FURNITURE MACT REQUIREMENTS – RECORDKEEPING – .....	24
WOOD FURNITURE MACT REQUIREMENTS – TESTING .....	25
WOOD FURNITURE MACT REQUIREMENTS – REPORTING.....	25
WOOD FURNITURE MACT REQUIREMENTS – SUBMITTALS.....	27
<b>FACILITY WIDE CONDITIONS.....</b>	<b>27</b>
LIMITATIONS.....	27
RECORDKEEPING.....	28
TESTING .....	28
<b>INSIGNIFICANT EMISSION UNITS .....</b>	<b>28</b>
<b>PERMIT SHIELD &amp; INAPPLICABLE REQUIREMENTS.....</b>	<b>29</b>
<b>GENERAL CONDITIONS.....</b>	<b>29</b>

## Facility Information

Permittee  
Elkay Manufacturing Company  
2222 Camden Court  
Oak Brook, IL 60523

Responsible Official  
Mike Kevern  
Plant Manager

Facility  
Elkay Wood Product Company  
2000 Cane Creek Parkway  
Ringgold, VA 24586

Contact Person  
Tommy Perdue  
Safety & Environmental Manager  
(434) 773-7508

**County-Plant Identification Number:** 51-143-00156

**Facility Description:** NAICS Code: 337110 – Wood Furniture Manufacturing Facility.  
SIC Code 2434 – Wood Kitchen Cabinets

The Elkay Wood Product Company (Elkay) operations consist of semi-custom cabinet manufacturing. Elkay receives particle board, plywood, and dimensionally cut lumber which has been pre-dried. There is no lumber drying kiln at the facility. Woodworking at the plant consists of numerous saw, planers, routers sanders, etc.

The finishing equipment consists of 19 spray booths, each equipped with a dry overspray filter for control of particulate emissions. The spray booths are configured as 3 lines of 6 booths each, plus one specialty line booth. Each finishing line is equipped with curing ovens; some are gas-fired and others are electric infrared dryers. Heat input capacity for the curing ovens are approximately 13.5 MMBtu/hr each. Heat for the facility is provided by four gas-fired space heaters rated at less than 2.0 MMBtu/hour total. The facility is also equipped with five gas-fired air make-up units for plant ventilation which are rated at 6.2 MMBtu/hr each. The facility has one emergency generator rated at 250 bhp. The unit is a diesel-fired compression ignition reciprocating combustion engine that was manufactured in October 2005 and used for power outages only.

The initial NSR permit to construct and operate this facility was issued on May 23, 2005. The permit was superseded on August 30, 2005 to modify baghouse acfm data.

Elkay Wood Products is not a PSD major source as they are limited to 245 tpy of volatile organic compounds (VOCs). The wood furniture MACT (40 CFR Part 63, Subpart JJ) applies to the wood furniture finishing portion of this facility since potential HAP emissions exceed 10 tpy of a single HAP and 25 tpy of combined HAPs.

The original Title V operating permit was issued with an effective date of January 1, 2008. The applicant submitted a timely and complete Title V application for a renewal (dated June 13, 2012).

## Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Woodworking Equipment</b>							
WW1 and WW3	BH1-1	Woodworking Area 1, door assembly and woodworking Area 3, model shop	System Air Handling Capacity 71,180 cfm	Fabric Filter MAC 144MCF494 or equivalent	BH1	PM, PM10	August 30, 2005
WW2, WW4 and WW5	BH2-1	Woodworking Area 2, Panel Processing, woodworking area 4 drawer box/shelves, and woodworking area 5, hinging area	System Air Handling Capacity 71,180 cfm	Fabric Filter MAC 144MCF494 or equivalent	BH2	PM, PM10	August 30, 2005
WW6	BH3-1	Woodworking Area 6, Wood Hog	System Air Handling Capacity 52,020 cfm	Fabric Filter MAC 144MCF494 or equivalent	BH3	PM, PM10	August 30, 2005
EG1		Emergency diesel generator	250 bhp				None
<b>Furniture Finishing Equipment</b>							
H1, M1 M2, S1		19 spray booths		Dry Overspray Filters		PM, PM10	August 30, 2005
J1		Curing Oven for sealer and topcoat booths	13.5 MMBtu/hr				None
K1		Curing Oven for sealer and glaze booths	13.5 MMBtu/hr				None
H1		Curing Oven for the entire finishing line	13.5 MMBtu/hr				None
H2		Curing Oven for the entire finishing line	13.5 MMBtu/hr				None
RC-1		1 Roll Coating Line		N/A			August 30, 2005

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

## **Diesel Engine (EG1) Requirements**

### **Limitations**

1. **Diesel Engine (EG1) Conditions – Limitations** - Visible emissions from the engine (EG1) stack shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)
2. **Diesel Engine (EG1) Conditions – Limitations** - The approved fuel for the engine (EG1) is diesel fuel. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-110)
3. **Diesel Engine (EG1) Conditions – Limitations** - The emergency engine (EG1) must meet the requirements of Table 2c(1) of 40 CFR 63 Subpart ZZZZ. Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2c(1). The analysis program must be part of the maintenance plan for the engine. If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2c(1), or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.  
(9 VAC 5-80-110 and 40 CFR 63.6602)
4. **Diesel Engine (EG1) Conditions – Limitations** - The permittee must operate and maintain the stationary RICE (EG1) and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether such operation and maintenance procedures being used are sufficient to minimize emissions will be based on available information which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.  
(9 VAC 5-80-110, 40 CFR 63.6605(b), 40 CFR 63.6640(a), and 40 CFR 63.6625(e))

5. **Diesel Engine (EG1) Conditions – Limitations** - The permittee shall comply with the applicable requirements of 40 CFR 63 Subpart A as shown in Table 8 of 40 CFR 63 Subpart ZZZZ.  
(9VAC 5-80-110 and 40 CFR 63.6665)
6. **Diesel Engine (EG1) Conditions – Limitations** - The emergency engine (EG1) shall be operated in accordance with 40 CFR 63.6640(f). Operation not in accordance with 40 CFR 63.6640(f) shall make the engine subject to the non-emergency requirements. Operation for non-emergency purposes may require a permit to modify and operate pursuant to 9 VAC 5-80 Article 6.  
(9VAC 5-80-110 and 40 CFR 63.6640(f))
7. **Diesel Engine (EG1) Conditions – Limitations** - The permittee shall minimize the engine's (EG1) time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.  
(9 VAC 5-80-110 and 40 CFR 63.6625(h))

## **Monitoring and Recordkeeping**

8. **Diesel Engine (EG1) Conditions – Monitoring** - The emergency engine (EG1) shall be equipped with a non-resettable hour meter. The reason for operation and length of time operated shall be recorded.  
(9 VAC 5-80-110, 40 CFR 63.6655(f), and 40 CFR 63.6625(f))
9. **Diesel Engine (EG1) Conditions – Monitoring** - At least one time in any week the engine operates an observation of the presence of visible emissions from the emergency engine (EG1) stack shall be made. The presence of visible emissions shall require the permittee to:
  - a. take timely corrective action such that the engine resumes operation with no visible emissions, or,
  - b. conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the affected area are 20 percent opacity or less. If any of the 15-second observations exceeds 20 percent opacity, the observation period shall continue for a total of sixty (60) minutes. If compliance is not demonstrated by this VEE, timely corrective action shall be taken such that the equipment resumes operation with visible emissions less than or equal to 20 percent opacity.

The permittee shall maintain an observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the engine has not been operated for any period during the week, it shall be noted in the log book.

(9 VAC 5-80-110)

10. **Diesel Engine (EG1) Conditions – Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
- a. All fuel supplier certifications.
  - b. A copy of each notification and report submitted to comply with 40 CFR 63 Subparts A and ZZZZ.
  - c. Records of the occurrence and duration of each malfunction of the emergency engine or any air pollution control and monitoring equipment.
  - d. Records of all required maintenance performed on the air pollution control and monitoring equipment.
  - e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning engine and air pollution control and monitoring equipment to its normal or usual manner of operation.
  - f. If the oil analysis program described in 40 CFR 63.6625(i) is implemented, the permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine.
  - g. Records of the reason and hours of operation for the emergency engine (EG1).

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.

(9 VAC 5-80-110, 40 CFR 63.6625(i), and 40 CFR 63.6655)

## **Woodworking Equipment Requirements (WW1 – WW6)**

### **Emission Control**

11. **Woodworking Equipment Conditions - Emission control** – Particulate emissions from the woodworking equipment (WW1-WW6) shall be controlled by two MAC Model 144MCF494 fabric filters (or equivalent) or one MAC Model 144MCF361 fabric filter (or equivalent). The fabric filters shall be provided with adequate access for inspection and shall be operating when the woodworking equipment is operating.  
(9 VAC 5-80-110 and Condition 3 of the 8/30/2005 NSR Permit)



12. **Woodworking Equipment Conditions - Emission control** – Fugitive particulate matter emissions from collecting and transferring of sawdust and shavings to/from storage sites shall be controlled by covering of all conveyors.  
(9 VAC 5-50-90 and 9 VAC 5-80-110)

### Limitations

13. **Woodworking Equipment Conditions - Limitations** – Particulate emissions (PM10) from the operation of each fabric filter associated with woodworking shall not exceed the limits specified below:

Reference Number	Grains/dscf	Tons/year
BH1, BH2	0.004	4.16
BH3	0.004	2.90

Annual emission limits shall apply to each consecutive 12-month period.  
(9 VAC 5-80-110 and Condition 8 of the 8/30/2005 NSR Permit)

14. **Woodworking Equipment Conditions - Limitations** - The exhaust from each fabric filter (BH1, BH2, BH3) shall not vent to outside air more than the following number of hours per year:

Reference Number	Annual hours venting to outside air
BH1, BH2	3410
BH3	3252

Annual hours of venting shall be calculated monthly as the sum of each consecutive 12-month period.  
(9 VAC 5-80-110 and Condition 9 of the 8/30/2005 NSR Permit)

15. **Woodworking Equipment Conditions - Limitations** – Visible emissions from each fabric filter controlling woodworking operations (BH1, BH2, BH3) shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).  
(9 VAC 5-80-110 and Condition 12 of the 8/30/2005 NSR Permit)
16. **Woodworking Equipment Conditions - Limitations** – Visible emissions from any fugitive emission points shall not exceed twenty percent (20%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except startup, shutdown, and malfunction.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)

## Monitoring

17. **Woodworking Equipment Conditions - Monitoring** – The fabric filters (BH1, BH2, BH3) shall be equipped with devices to continuously measure the differential pressure drop across the filters. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the associated fabric filter is operating.  
(9 VAC 5-80-110 and Condition 6 of the 8/30/2005 NSR Permit)

## Recordkeeping

18. **Woodworking Equipment Conditions - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
- Monthly and annual hours of operation during which each fabric filter (BH1, BH2, BH3) was vented to outside air.
  - Volumetric flow rating for fans associated with each fabric filter (BH1, BH2, BH3).
  - Records of differential pressure across each baghouse and cartridge filter fabric filter.
  - Results of all stack tests, visible emissions evaluations and performance evaluations.

These records shall be available on site for inspection by DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 14 of the 8/30/2005 NSR Permit)

## Compliance Assurance Monitoring (CAM)

19. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** – The permittee shall implement a Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filters controlling particulate from the woodworking operation in accordance with the following table. Each monitor shall be approved, and in compliance with 40 CFR 64.3(b) or (d).

	<b>Indicator 1</b>
<b>Indicator</b>	Visible Emissions
Measurement Approach	Observation of each fabric filter to determine the presence or absence of visible emissions from the exhaust or structure
<b>Indicator Range</b>	An excursion is defined as any observed visible emissions.
	<b>Performance Criteria</b>
Data	Measurements are made at the emission point.

Representativeness	
Verification of Operational Status	Not applicable.
QA/QC Practices and Criteria	The observer will be trained in Method 22 procedures.
Monitoring Frequency	Daily. Daily observation is not required for any unit that has no venting to the outside air during that day.
Data Collection Procedures	All daily observations (or notation that a fabric filter did not vent to the outside air on a given date) will be recorded in a logbook at the facility. All excursions will be documented and reported.
Averaging Period	Not applicable

Changes pertaining to the information in this condition shall not be implemented prior to approval by the DEQ. Changes may require public participation according to the requirements of 9 VAC 5-80-230.

(9 VAC 5-80-110 E and 40 CFR 64.6(c))

20. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** – The permittee shall conduct monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
 (9 VAC 5-80-110 E and 40 CFR 64.6(c))
21. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** – Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the fabric filters are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data available requirement, if applicable. The permittee shall use all of the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.  
 (9 VAC 5-80-110 E and 40 CFR 64.7(c))
22. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the fabric filter(s) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause

of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

(9 VAC 5-80-110 E and 40 CFR 64.7 (d)(1))

23. **Woodworking Equipment Conditions – (BH1, BH2, BH3) - CAM** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))

24. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly (in accordance with Condition 62) notify the Director, Blue Ridge Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(9 VAC 5-80-110 E and 40 CFR 64.7(e))

25. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** - If the number of visible emission excursions documented for a fabric filter exceeds 2 excursions for any consecutive 90 observations, or as otherwise required by the DEQ in accordance with review conducted under 40 CFR 64.7(d)(2), the, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection.

(9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))

26. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM** - Monitoring imposed under 40 CFR Part 64 shall not excuse the permittee from complying with any existing requirements under federal, state, local law, or any other applicable requirement under the Act, as described in 40 CFR 64.10.

(9 VAC 5-80-110 E and 40 CFR 64.10)

27. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM - Recordkeeping** - The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other

supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(9 VAC 5-80-110 E and 40 CFR 64.9(b))

28. **Woodworking Equipment Conditions – (BH1, BH2, BH3) CAM – Reporting -** The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by General Condition 60 of this permit to the Director, Blue Ridge Regional Office. Such reports shall include at a minimum:

- a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

## Testing

29. At a frequency not to exceed once every five years, and upon request by the DEQ, the permittee shall conduct a stack test for particulate emissions (PM10) from at least one fabric filter to demonstrate compliance with the grains/dscf emission limit in Condition 13 of this permit. In the event no fabric filter is vented to outside air for more than 2000 hours in every consecutive 12 month period, this requirement is waived. In the event at least one filter is vented to outside air for more than 2000 hours within a consecutive 12 month period, testing shall be conducted within 180 days of the 2000<sup>th</sup> hour of venting outside air. Unless otherwise requested by the Blue Ridge Regional Office, performance testing required by this conditions shall not be repeated for a given fabric filter until both other fabric filters have been tested. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and the applicable test methods and procedures contained in 40 CFR, Appendix A and 40 CFR 51 Appendix M. The details of the tests are to be arranged with the Blue Ridge Regional Office. The permittee shall submit a test protocol at least thirty (30) days prior to testing. One copy of the test results shall be submitted to the Blue Ridge Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 16 of the 8/30/2005 NSR Permit)

30. Concurrently with the performance tests, Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall also be conducted on the fabric filter tested in accordance with Condition 29 of this permit. (In the event testing under Condition 29 is waived, this VEE requirement is also waived). Each test shall consist of 30 sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the tests are to be arranged with the Blue Ridge Regional Office. The evaluations shall be performed within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the permitted facility. Should conditions prevent concurrent opacity observations, the Blue Ridge Regional Office shall be notified in writing, within seven days, and visible emissions testing shall be rescheduled within 30 days. Rescheduled testing shall be conducted under the same conditions (as possible) as the initial performance tests. One copy of the test result shall be submitted to the Blue Ridge Regional Office within 60 days after test completion.

(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 17 of the 8/30/2005 NSR Permit)

## **Furniture Finishing Equipment Conditions (H1, M1, M2, S1, RC-1)**

### **Emission Control**

31. **Furniture Finishing Equipment Conditions - Emission control** – Particulate emissions from the finishing spray booths shall be controlled by dry overspray filters. The filters shall be provided with adequate access for inspection and each filter shall be in place when the associated finishing booth is operating.

(9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 4 of the 8/30/2005 NSR Permit)

### **Limitations**

32. **Furniture Finishing Equipment Conditions - Limitations** – Total emissions from the operation of the finishing system (all coatings, adhesives, thinners, cleaning solvents and other VOC containing materials used), including emissions from any storage or surge tanks, shall not exceed the limits specified below:

PM-10	2.66 lb/hour	3.67 tons/yr
Volatile Organic Compounds		245.0 tons/yr

Annual emissions shall apply to each consecutive 12 month period.

(9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 10 of the 8/30/2005 NSR Permit)

33. **Furniture Finishing Equipment Conditions - Limitations** – Visible emissions from each spray booth exhaust shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).  
(9 VAC 5-80-110 and Condition 11 of the 8/30/2005 NSR Permit)

## Monitoring

34. At least one time daily an observation of the presence of visible emissions from the spray booth stacks shall be made. The presence of visible emissions shall require the permittee to:
- Take timely correction action such that the unit resumes operation with no visible emissions, or,
  - Conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60 Appendix A) for a minimum of six minutes, to assure visible emissions from the affected unit are 5 percent opacity or less. If any of the 15-second observations exceeds 5 percent opacity, the observation period shall continue for a total of sixty (60) minutes. If compliance is not demonstrated by this VEE, timely corrective action shall be taken such that the equipment resumes operation with visible emissions less than or equal to 5 percent opacity.

The permittee shall maintain an observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions the results of all VEEs, any necessary corrective action, and the name of the observer. If the unit has not been operated for any period during the week, it shall be noted in the log book.

(9 VAC 5-80-110)

## Recordkeeping

35. **Furniture Finishing Equipment Conditions – Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
- Certified Product Data Sheets (CPDS), Material Safety Data Sheets (MSDSs), or other vendor information showing VOC content, HAP, and VHAP content, water content, and solids content for each coating, adhesive, thinner, cleaning solvent, or other VOC containing material used.
  - Monthly and annual throughput (in gallons) of each coating, adhesive, thinner, cleaning solvent, or other VOC containing material used in the manufacturing process. Annual throughputs shall be calculated monthly as the sum of each consecutive 12 month period.

- c. Monthly and annual emissions calculations for VOC consumption and emissions from the finishing operations and solvent cleaning using calculation methods approved by the Blue Ridge Regional Office to verify compliance with the ton/month and ton/yr emissions limitations in Conditions 32 and 33. Annual emissions and consumption shall be calculated monthly as the sum of each consecutive 12 month period.
- d. Records of spray booth dry filter inspections.
- e. Results of all stack tests, visible emissions evaluations and performance evaluations.

These records shall be available on site for inspection by DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 14 of the 8/30/2005 NSR Permit

## **Wood Furniture MACT (40 CFR 63 Subpart JJ)**

### **Wood Furniture MACT Requirements – Limitations**

- 36. **Wood Furniture MACT Requirements – Limitations** - The facility is to be operated in compliance with the Federal requirements under 40 CFR Part 63 Subpart JJ (hereafter, Subpart JJ) including applicable future revisions. All terms used regarding 40 CFR 63 Subpart JJ shall have the meanings as defined in 40 CFR 63.801 and 40 CFR 63.2.  
(9 VAC 5-60-100, 40 CFR 63.800 and 40 CFR 63 Subpart A)
- 37. **Wood Furniture MACT Requirements – Limitations** Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits:
  - a. For finishing operations use of any of the following methods:
    - i. Achieve a weighted average VHAP content across all coatings of 0.8 lb VHAP/lb solids, as applied;
    - ii. Use compliant finishing materials that meet the following specifications:
      - (a) Each sealer and topcoat has a VHAP content of no more than 0.8 VHAP/lb solids, as applied;
      - (b) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids as applied;
      - (c) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by (e) of this sub-section. For purposes of calculating thinner content of this section, VHAP equals HAP;



- (d) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, that has a VHAP content of no more than 0.8 VHAP/lb solids, as applied; and,
    - (e) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight.
  - iii. Use any combination of averaging and compliance coatings such that no greater than 0.8 lb of VHAP being emitted per lb of solids used;
- b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids as applied;
- c. Compliant contact adhesives shall be used based on the following criteria:
  - i. For aerosol adhesives, as well as hot melt, PVA, and urea formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;
  - ii. For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 0.2 lb VHAP/lb solids, as applied; and,
  - iii. For all other contact adhesives the VHAP content can be no more than 0.2 lb VHAP/lb solids, as applied.
- d. Limit formaldehyde emissions by complying with either of the following methods:
  - i. Limit total formaldehyde ( $F_{\text{total}}$ ) use in coatings and contact adhesives to no more than 400 pounds per rolling 12-month period; or
  - ii. Use coatings and contact adhesives only if they have a product concentration of less than or equal to 1.0 percent formaldehyde by weight.
- e. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operations and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. Operation and maintenance requirements established pursuant to section 112 of the Clean Air Act are enforceable independent of emissions limitations or other requirements in relevant standard.

(9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63.802 and 40 CFR 63.6(e)(1)(iii))

### **Wood Furniture MACT Requirements – Work Practice Standards**

38. **Wood Furniture MACT Requirements – Work Practice Standards** - The permittee shall develop and implement the following work practice standards:

- a. Work practice implementation plan – The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in 40 CFR 63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- b. Operator training course – The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, on the use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
  - i. A list of all current personnel by name and job description that are required to be trained;
  - ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
  - iii. Lesson plans for course to be given at the initial and annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
  - iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

- c. Inspection and maintenance plan – The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
  - ii. An inspection schedule;
  - iii. Methods for documenting the date and results of each inspection and any repairs that were made;
  - iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
    - (a) A first attempt at repair (e.g. tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
    - (b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- d. Cleaning and washoff solvent accounting system – The permittee shall develop an organic HAP solvent accounting form to record:
- i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;
  - ii. The number of pieces washed off, the reason for the washoff; and
  - iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e. Chemical composition of cleaning and washoff solvents – The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
- f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP

solvent per booth to prepare the surface of the booth prior to applying the booth coating.

- g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. Application equipment requirements – The permittee shall not use conventional air spray guns.
- i. Line cleaning – The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. Gun cleaning – The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. Washoff operations – The permittee shall control emissions from washoff operations by:
  - i. Using normally closed tanks for washoff; and
  - ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- l. Formulation assessment plan for finishing operations – The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
  - i. Identifies VHAP from the list presented in Table 5 of Subpart JJ that are being used in finishing operations;
  - ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by 40 CFR 63.803(1)(2). For VHAPs that do not have a baseline, one will be established according to Condition (vi) below.
  - iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.
  - iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the Blue Ridge Regional Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

- (a) The exceedance is no more than 15.0 percent above the baseline level;
  - (b) Usage of the VHAP is below the de minimis level presented in Table 5 of 40 CFR 63 Subpart JJ for that VHAP;
  - (c) The affected source is in compliance with its State's air toxic regulations or guidelines for that VHAP; or
  - (d) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids as applied.
- v. If none of the explanations listed in the Condition iv. above are the reason for the increase, the permittee shall confer with the Blue Ridge Regional Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the Blue Ridge Regional Office and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- vi. If the permittee uses VHAP of potential concern listed in Table 6 of Subpart JJ for which baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the Blue Ridge Regional Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition iv. above, the affected source shall follow the procedures established in Condition v. above.

(9 VAC 5-80-110 and 40 CFR 63.803(a)-(l))

### **Wood Furniture MACT Requirements – Limitations –**

39. **Wood Furniture MACT Requirements – Limitations** - The permittee shall comply with the applicable sections of 40 CFR Part 63 Subpart A as identified in Table 1 to 40 CFR Part 63 Subpart JJ – General Provisions Applicability to Subpart JJ.  
(9 VAC 5-80-110)

## Wood Furniture MACT Requirements – Monitoring –

40. **Wood Furniture MACT Requirements – Monitoring** - Continuous compliance with the VHAP emissions limits shall be determined as follows:

- a. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 0.8. The facility is in violation of the standard if E is greater than 0.8 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

Equation 1:

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.

$M_c$  = the mass of solids in a finishing material or coating used monthly, including exempt finishing materials and coatings, lb solids/month.

$C_c$  = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.

W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month ( $M_c$  in lb solids / month) multiplied by the VHAP content in each material ( $C_c$  in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month ( $M_c$  in lb solids / month).

- b. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 37 have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility

is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

- c. For contact adhesive operations when compliant adhesives are being used to show compliance, the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
- d. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
- e. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the Administrator may require the permittee to modify the plan (see Condition 38.a).
- f. For formaldehyde emissions the permit shall demonstrate compliance by one of the following methods:
  - i. Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of  $F_{total}$  no more than 400 pounds per rolling 12 month period, as stated in Condition 37.d.

Equation 5

$$F_{total} = (C_{f1} V_{c1} + C_{f2} V_{c2} + * * * + C_{fn} V_{cn} + G_{f1} V_{g1} + * * * + G_{f2} V_{g2} + * * * + G_{fn} V_{gn})$$

- ii. Maintain a certified product data sheet for each coating and contact adhesive used and submit a compliance certification with the semiannual report. The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by

records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used.

(9 VAC 5-80-110, 40 CFR 63.804(g) and (h))

### **Wood Furniture MACT Requirements – Recordkeeping –**

41. **Wood Furniture MACT Requirements – Recordkeeping** - The permittee shall maintain records of the following:
- a. For emission limit purposes, the permittee shall maintain the following:
    - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Condition 37;
    - ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Conditions 37.a and 37.c;
    - iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Condition 37.b; and,
    - iv. The formaldehyde content in lb/gal, as applied, of each finishing material and contact adhesive to comply with the emission limit in Condition 37.d.
  - b. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
  - c. Onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
    - i. Records demonstrating that the operator training program required by Condition 38.d is in place;
    - ii. Records collected in accordance with the inspection and maintenance plan required by Condition 38.c;
    - iii. Records associated with the cleaning solvent accounting system required by Condition 38.d;
    - iv. Records associated with the formulation assessment plan required by Condition 38.i; and



- v. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- d. Compliance certifications submitted for each semiannual period following the compliance date.
- e. All other information submitted with the compliance status report and the semiannual reports.
- f. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-80-110, 40 CFR 63.806 and 63.10(b)(1))

### **Wood Furniture MACT Requirements – Testing**

42. **Wood Furniture MACT Requirements – Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use appropriate test methods in accordance with procedures approved by the DEQ or specified in Subpart JJ.  
(9 VAC 5-80-110 and 40 CFR 63.805)

### **Wood Furniture MACT Requirements – Reporting**

43. **Wood Furniture MACT Requirements – Reporting** - Each time a notification of compliance status is required, the permittee shall submit to the Blue Ridge Regional Office and Administrator, a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with 40 CFR Part 63 Subpart JJ. The notification shall list:
- a. The methods that were used to determine compliance;
  - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
  - c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;
- e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions generated for this notification);
- f. A description of the method for each emission point, including each method for each hazardous air pollutant and control efficiency (percent) for each method; and,
- g. A statement by the permittee as to whether the facility has complied with 40 CFR Part 63 Subpart JJ as expressed in this permit.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.9(h))

44. **Wood Furniture MACT Requirements – Reporting** - The permittee shall provide the following information to the US EPA and VA DEQ:

- a. The permittee when demonstrating continuous compliance shall submit a report covering the previous six (6) months of wood furniture manufacturing operations.
  - i. Reports shall be submitted no later than March 1 and September 1 of each calendar year.
- b. The semiannual reports with the following information included:
  - i. The information required in Condition 60;
  - ii. A statement of whether the facility was in compliance or noncompliance; and,
  - iii. If the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
- c. The permittee, when required to provide a written notification by Condition 38.1. for exceedance of a baseline level 40 CFR 63.803(1)(4), shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
- d. The required compliance certification shall be signed by a responsible official of the company that owns or operates the permitted source and submitted with the semiannual report.
- e. Reports to fulfill the applicable reporting requirements of 40 CFR 63.7 through 63.10 of Subpart A.

Copies of reports shall be submitted to the US EPA and VA DEQ at the address given in Condition 45.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.807 & 63.7 through 63.10))

## **Wood Furniture MACT Requirements – Submittals**

45. **Wood Furniture MACT Requirements - Submittals** - Reports and submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the Blue Ridge Regional Office, and to EPA Region III at the following addresses:

Copies of each 40 CFR 63 Subpart JJ (MACT JJ) report shall be sent to:  
U.S. EPA Region III  
Air Protection Division  
ATTN: Wood Furniture NESHAP Coordinator  
1650 Arch Street  
Philadelphia, PA 19103-2029

VA DEQ  
Director, Blue Ridge Regional Office  
Attn: Air Compliance Manager  
3019 Peters Creek Road  
Roanoke, VA 24019

(9 VAC 5-60-100 and 40 CFR 63.10(d) & 63.13)

## **Facility Wide Conditions**

### **Limitations**

46. **Facility Wide Conditions – Limitations** – Operations and Maintenance Procedures - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the air pollution control equipment and maintain records of inspection results.

- c. Have available written operating procedures for the air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
- e. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.  
(9 VAC 5-80-110 and 9 VAC 5-50-20E)

### **Recordkeeping**

47. **Facility Wide Conditions – Recordkeeping** – The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50 and 9 VAC 5-80-110)

### **Testing**

48. **Facility Wide Conditions – Testing** – The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. This includes constructing the facility such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and provided stack or duct that is free from cyclonic flow. Test ports shall be provided when requested at the appropriate locations.

(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 15 of the 8/30/2005 permit)

### **Insignificant Emission Units**

49. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

<b>Emission Unit No.</b>	<b>Emission Unit Description</b>	<b>Citation</b>	<b>Pollutant(s) Emitted</b> <b>9 VAC 5-80-720 B</b>	<b>Rated Capacity</b> <b>9 VAC 5-80-720 C</b>
SH1-4	N.G. fired space heaters 2 @ 0.1 MMBtu/hr 2 @ 0.175 MMBtu/hr	9 VAC 5-80-720 C		Total Combined <2.0 MMBtu/hr
MU 1-5	Natural gas-fired make-up air units for ventilation	9 VAC 5-80-720 C		6.2 MMBtu/hr each

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

## Permit Shield & Inapplicable Requirements

50. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

<b>Citation</b>	<b>Title of Citation</b>	<b>Description of Applicability</b>
None	None	None

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

## General Conditions

51. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
 (9 VAC 5-80-110 N)

52. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
53. **General Conditions - Permit Expiration** - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
54. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
55. **General Conditions - Permit Expiration** - No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
56. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
57. **General Conditions - Permit Expiration** - The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
58. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements.
- b. The date(s) analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses.
- f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

59. **General Conditions – Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

60. **General Conditions – Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedance of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

61. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- b. The identification of each term or condition of the permit that is the basis of the certification.
- c. The compliance status.
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- f. Such other facts as the permit may require to determine the compliance status of the source.
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3\_APD\_Permits@epa.gov

(9 VAC 5-80-110 K.5)

62. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement



explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition 60 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

63. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Blue Ridge Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Blue Ridge Regional Office.  
(9 VAC 5-20-180 C)
64. **General Conditions – Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9 VAC 5-80-110 G.1)
65. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9 VAC 5-80-110 G.2)
66. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9 VAC 5-80-110 G.3)
67. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9 VAC 5-80-190 and 9 VAC 5-80-260)

68. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9 VAC 5-80-110 G.5)
69. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9 VAC 5-80-110 G.6)
70. **General Conditions – Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.  
(9 VAC 5-80-110 K.1)
71. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.  
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)
72. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

73. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

74. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

75. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

76. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

77. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

78. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

79. **General Conditions – Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

80. **General Conditions – Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

81. **General Conditions - Malfunction as an Affirmative Defense** - A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of Condition 82 are met.

(9 VAC 5-80-250)

82. **General Conditions – Malfunction as an Affirmative Defense** - The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
- b. The permitted facility was at the time being properly operated.
- c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

(9 VAC 5-80-250)

83. **General Conditions – Malfunction as an Affirmative Defense** - In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

(9 VAC 5-80-250)

84. **General Conditions – Malfunction as an Affirmative Defense** - The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.  
(9 VAC 5-80-250)
85. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-190 C and 9 VAC 5-80-260)
86. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9 VAC 5-80-80 E)
87. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(40 CFR Part 82, Subparts A-F)
88. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)
89. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(40 CFR Part 68)
90. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

91. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
  - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
  - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)